

1 Richard H. Poulson (SBN: 178479)
LAW OFFICE OF RICHARD H. POULSON
2 The Mansard Building
2233 Santa Clara Avenue, Suite 3
3 Alameda, California 94501
Telephone: (510) 747-8034
4 E-mail: rich@richardpoulsonlaw.com

5 Attorneys for Defendant
SAMEER PADHYE

6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 NATIONAL SPECIALTY PHARMACY, LLC,

10 Plaintiff,

11 v.

12 SAMEER PADHYE,

13 Defendant.

Case No.: 5:23-CV-4357-NW

**DECLARATION OF RICHARD H.
POULSON IN SUPPORT OF DEFENDANT
SAMEER PADHYE'S NOTICE OF
MOTION AND MOTION PURSUANT TO
N.D. CAL. CIVIL L.R. 7-9 FOR LEAVE TO
FILE MOTION FOR RECONSIDERATION**

Trial Date: September 15, 2025

1 I, Richard H. Poulson, hereby declare as follows:

2 1. I am counsel of record for Defendant Sameer Padhye in the above-referenced action.

3 2. Attached hereto as Exhibit A is a true and correct copy of a December 20, 2024 e-mail
4 to Judge Pitts requesting a modification of various deadlines, and the accompanying stipulation and
5 proposed order agreed to by all parties.

6 3. Attached hereto as Exhibit B is a true and correct copy of a February 10, 2025 e-mail to
7 Judge Pitts inquiring as to the status of the requested modification.

8 4. I have communicated with Mr. Nitoj P. Singh, counsel for Plaintiff National Specialty
9 Pharmacy, LLC, both via e-mail and telephone and he confirmed that he does not oppose the
10 modification of the dispositive motion deadline. Moreover, the parties have agreed to an August 20,
11 2025 hearing date.

12 4. I declare under penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct.

14 DATED: May 22, 2025

LAW OFFICE OF RICHARD H. POULSON

15
16 By /s/ Richard H. Poulson
17 RICHARD H. POULSON
18 Attorney for Defendant
19 SAMEER PADHYE
20
21
22
23
24
25
26
27
28

EXHIBIT A

Archived: Thursday, May 22, 2025 4:07:55 PM

From: [Richard Poulson](#)

Sent: Friday, December 20, 2024 9:27:57 PM

To: pcppo@cand.uscourts.gov

Cc: [Nitoj Singh \(Dhillon Law\)](#) [Anthony Fusaro \(Dhillon Law\)](#) [Daniel Brown](#)

Subject: 5:23-cv-04357-PCP National Specialty Pharmacy, LLC v. Padhye et al Proposed Order

Importance: Normal

Sensitivity: None

Attachments:

[NSP v. Padhye - Stip and \[Prop} Order Re Discovery Deadlines.docx](#);

Dear Judge Pitts –

The parties in this action are working to resolve some discovery issues and respectfully request that this Court approve the attached Stipulation and [Proposed] Order Re Discovery Deadlines. The requested changes do not affect the Joint Pretrial Conference date or trial date but give the parties additional time to resolve their disputes before engaging in expert discovery. All counsel and self-represented parties are copied.

Sincerely,

Richard H. Poulson

Counsel for Defendant Sameer Padhye

Richard H. Poulson

Law Office of Richard H. Poulson

The Mansard Building

2233 Santa Clara Avenue, Suite 3

Alameda, California 94501

(510) 747-8034

www.richardpoulsonlaw.com

Richard H. Poulson (SBN: 178479)
rich@richardpoulsonlaw.com
LAW OFFICE OF RICHARD H. POULSON
The Mansard Building
2233 Santa Clara Avenue, Suite 3
Alameda, California 94501
Tel: (510) 747-8034

*Attorneys for Defendant
Sameer Padhye*

NITIJ P. SINGH (SBN: 265005)
nsingh@dhillonlaw.com
ANTHONY J. FUSARO, JR. (SBN: 345017)
afusaro@dhillonlaw.com
DHILLON LAW GROUP INC.
177 Post Street, Suite 700
San Francisco, California 94108
Tel: (415) 433-1700

*Attorneys for Plaintiff
National Specialty Pharmacy, LLC*

BENJAMIN D. BROWN
2858 Cabrillo Terrace St.
Henderson, NV 89044
(702) 561-7634
Pro Se

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL SPECIALTY PHARMACY,
LLC

Plaintiff,

vs.

SAMEER PADHYE, an individual;
BENJAMIN D. BROWN, an individual; and
DOES 1 to 49, inclusive,

Defendants.

Case Number: 5:23-cv-04357-PCP

**STIPULATION AND [PROPOSED] ORDER
REGARDING DISCOVERY DEADLINES**

Trial Date: September 8, 2025

Pursuant to Civil L.R. 7-12, Plaintiff National Specialty Pharmacy, LLC, Defendant Sameer Padhye, and Defendant Benjamin D. Brown respectfully submit this Stipulation and Proposed Order Regarding Discovery Deadlines. The parties are in the process of resolving several discovery disputes and hereby request that this Court amend pending discovery deadlines as follows and set certain additional deadlines to allow time for them to address and resolve these issues. The parties do not request an amendment of the Joint Pretrial Conference or Jury Trial dates.

The parties therefore request this Court to amend the pending discovery deadlines as follows:

Plaintiff's deadline to produce or identify documents or communications reflecting Defendant Sameer Padhye's alleged misuse of Plaintiff National Specialty Pharmacy, LLC's Monday.com account.	December 20, 2024
---	-------------------

Plaintiff's deadline to re-produce its document production in compliance with the Stipulated Protective Order (Dkt. No. 111)	January 6, 2025
--	-----------------

Deadline to complete the deposition of Plaintiff's Fed.R.Civ.P. 30(b)(6) witness	January 10, 2025
--	------------------

Deadline to raise discovery issues with the Court	January 17, 2025
---	------------------

Designation of Opening Experts with Reports	May 3, 2025
---	-------------

Designation of Rebuttal Experts with Reports	May 28, 2025
--	--------------

Completion of ADR	June 21, 2025
-------------------	---------------

Filing of dispositive/ <i>Daubert</i> Motion(s)	June 21, 2025
---	---------------

The parties hereby stipulate to these deadlines.

Date: December 20, 2024

LAW OFFICE OF RICHARD H. POULSON

By: /s/ Richard H. Poulson
 Richard H. Poulson (SBN: 178479)
 2233 Santa Clara Avenue, Suite 3
 Alameda, California 94501
 t.510.747.8034
 rich@richardpoulsonlaw.com

*Attorneys for Defendant
 Sameer Padhye*

1 Date: _December 20, 2024

DHILLON LAW GROUP INC.

2 By: /s/ Nitoj P. Singh

3 Nitoj P. Singh (SBN: 265005)
4 Anthony J. Fusaro, Jr. (SBN: 345017)
5 Dhillon Law Group Inc.
6 177 Post Street, Suite 700
7 San Francisco, CA 94108
8 t.415.433.1700
9 nsingh@dhillonlaw.com
10 afusaro@dhillonlaw.com

Attorneys for Plaintiff
National Specialty Pharmacy, LLC

11 Dated: December 20, 2024

BENJAMIN D. BROWN

12 By: /s/ Benjamin D. Brown

13 2858 Cabrillo Terrace
14 Henderson, NV 89044
15 (702) 461-7634
16 b.d.brown@gmail.com
17 *Pro Se*

18 **IT IS SO ORDERED.**

19
20 Dated: _____

21 _____
22 P. Casey Pitts
23 United States District Judge
24
25
26
27
28

EXHIBIT B

Richard Poulson

From: Richard Poulson
Sent: Monday, February 10, 2025 8:04 AM
To: CRD PCP; pcppo@cand.uscourts.gov
Cc: Nitoh Singh (Dhillon Law); Anthony Fusaro (Dhillon Law); Daniel Brown
Subject: FW: 5:23-cv-04357-PCP National Specialty Pharmacy, LLC v. Padhye et al Proposed Order
Attachments: NSP v. Padhye - Stip and [Prop] Order Re Discovery Deadlines.docx; NSP v. Padhye - CMO (11-22-24).pdf

Dear Judge Pitts –

I am writing to follow up on the parties' request for a slight modification of the Court's Case Management Order (both the stipulation/proposed order and current CMO are attached). The parties have completed fact discovery and are in communications with the appointed mediator regarding further settlement discussions. The request does not affect the Joint Preconference date or the trial date. If the Court wishes that the parties file an administrative motion seeking this relief, we will do so. All parties are copied on this e-mail. Thanks.

- Rich Poulson

Richard H. Poulson
Law Office of Richard H. Poulson
The Mansard Building
2233 Santa Clara Avenue, Suite 3
Alameda, California 94501
(510) 747-8034
www.richardpoulsonlaw.com

This e-mail message is confidential, is intended only for the named recipient(s) above, and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. If you have received this message in error, or are not a named recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this message in error, please immediately notify the sender by return e-mail and delete this e-mail message from your computer. Thank you.

From: Richard Poulson
Sent: Friday, December 20, 2024 9:28 PM
To: pcppo@cand.uscourts.gov
Cc: Nitoh Singh (Dhillon Law) <nsingh@dhillonlaw.com>; Anthony Fusaro (Dhillon Law) <AFusaro@dhillonlaw.com>; Daniel Brown <b.d.brown@gmail.com>
Subject: 5:23-cv-04357-PCP National Specialty Pharmacy, LLC v. Padhye et al Proposed Order

Dear Judge Pitts –

The parties in this action are working to resolve some discovery issues and respectfully request that this Court approve the attached Stipulation and [Proposed] Order Re Discovery Deadlines. The requested changes do not

affect the Joint Pretrial Conference date or trial date but give the parties additional time to resolve their disputes before engaging in expert discovery. All counsel and self-represented parties are copied.

Sincerely,
Richard H. Poulson
Counsel for Defendant Sameer Padhye

Richard H. Poulson
Law Office of Richard H. Poulson
The Mansard Building
2233 Santa Clara Avenue, Suite 3
Alameda, California 94501
(510) 747-8034
www.richardpoulsonlaw.com